

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

IN RE MBNA CORPORATION  
DERIVATIVE AND CLASS LITIGATION

Lead Case No. 1:05-cv-00327-GMS

This Document Relates To:

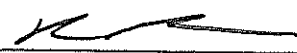
ALL ACTIONS.

**STIPULATION TO EXTEND TIME TO FILE  
CONSOLIDATED DERIVATIVE AND CLASS COMPLAINT**

Plaintiffs and defendants, by and through their respective counsel, hereby stipulate and agree, subject to the approval of the Court, that the deadline for plaintiffs to file their Consolidated Derivative and Class Complaint is hereby extended through and including November 21, 2005.

Plaintiffs request this time to review MBNA Corporation's September 19, 2005 Proxy Statement related to the claims in the instant action with Plaintiffs' expert and to examine MBNA's recently released results for the quarter ending September 30, 2005.

CHIMICLES & TIKELLIS LLP

  
Pamela S. Tikellis (#2172)  
Robert J. Kriner, Jr. (#2546)  
A. Zachary Naylor (#4439)  
Robert R. Davis (#4536)  
One Rodney Square  
P.O. Box 1035  
Wilmington, DE 19899  
302-656-2500 (telephone)  
302-656-9053 (facsimile)

Attorneys for Plaintiffs

OF COUNSEL:

PASKOWITZ & ASSOCIATES

Laurence Paskowitz  
60 East 42<sup>nd</sup> Street, 46<sup>th</sup> Floor  
New York, NY 10165  
212-685-0969 (telephone)  
212-685-2306 (facsimile)

ROBBINS UMEDA & FINK, LLP

Brian J. Robbins  
Jeffrey P. Fink  
610 West Ash Street, Suite 1800  
San Diego, CA 92101  
619-525-3990 (telephone)  
619-525-3991 (facsimile)

YOUNG CONAWAY STARGATT &  
TAYLOR, LLP

*Richard Morse by mail* #3109

Richard H. Morse (#531)  
1000 West Street, 17<sup>th</sup> Floor  
P.O. Box 391  
Wilmington, DE 19899  
302-571-6600 (telephone)  
302-576-3319 (facsimile)

Counsel for nominal defendant MBNA  
Corporation and defendants Bruce L.  
Hammonds, Kenneth A. Vecchione, Richard  
K. Struthers, John R. Cochran, III, Lance L.  
Weaver, Charles C. Krulak, Michael G.  
Rhodes and John W. Schefflen

OF COUNSEL:

SULLIVAN & CROMWELL LLP

Richard C. Pepperman, II  
125 Broad Street  
New York, New York 10004  
212-558-4000 (telephone)  
212-558-3588 (facsimile)

SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP



Edward P. Welch (#671)  
One Rodney Square  
P.O. Box 636  
Wilmington, DE 19899  
302-651-3060 (telephone)  
302-651-3001 (facsimile)

Counsel for defendants James H. Berick,  
Mary M. Boies, Benjamin R. Civiletti,  
William L. Jews, Randolph D. Lerner, Stuart  
L. Markowitz, William B. Milstead, Laura  
S. Unger and Thomas G. Murdough

OF COUNSEL:

SKADDEN, ARPS, SLATE, MEAGHER & FLOM, LLP  
Jay B. Krasner  
Four Times Square  
New York, NY 10036  
212-735-3000 (telephone)  
212-735-2000 (facsimile)

**ORDER**

The above stipulation having been considered, and good cause appearing therefore, IT IS  
SO ORDERED.

\_\_\_\_\_  
DATED

\_\_\_\_\_  
HONORABLE GREGORY M. SLEET  
DISTRICT COURT JUDGE